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January 22, 2016

**Via Certified Mail - Return Receipt Requested**

Managing Agent  
Samson Tug and Barge  
6361 1<sup>st</sup> Ave S  
Seattle WA 98108

**RECEIVED ON:**

Kirk Miles  
Terminal Manager  
Samson Tug and Barge Company Inc  
6361 1st Ave S  
Seattle WA 98108-3228

**JAN 29 2016**  
*ORC*  
EPA Region 10  
Office of the Regional Administrator

Gilmur/Hale Family Trust  
George Baggen, President  
PO Box 559  
Sitka, AK 99835

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND  
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION  
PLAN**

Dear Managing Agent and Samson Tug and Barge Facility Owner:

We represent Puget Soundkeeper Alliance ("Soundkeeper"), 130 Nickerson Street, Suite 107, Seattle, WA 98109, (206) 297-7002. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days notice of Soundkeeper's intent to file a citizen suit against Samson Tug and Barge Company, Inc. ("Samson") under section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Samson's National Pollution Discharge Elimination System ("NPDES") permit.

Samson was granted coverage effective March 12, 2009, under Washington's Industrial Stormwater General Permit ("ISGP") issued by the Washington Department of Ecology ("Ecology") on August 21, 2002, effective September 20, 2002, modified on December 1, 2004, reissued on August 15, 2007, effective September 15, 2007, reissued again on October 15, 2008, effective November 15, 2008, and remaining effective through December 31, 2009, under NPDES permit No. SO3011484 (the "2002 Permit"). Samson was

granted coverage under the subsequent iteration of the Washington ISGP issued by Ecology on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, and remaining effective through January 1, 2015, under NPDES Permit No. WAR011484 (the "2010 Permit"). Ecology granted coverage under the current iteration of the ISGP, issued by Ecology on December 3, 2014, effective January 2, 2015, and set to expire on December 31, 2019, (the "2015 Permit") and maintains the same permit number, WAR011484.

Samson has violated and continues to violate the terms and conditions of the 2010 Permit and 2015 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from, its facility, Samson Tug and Barge Co and Duwamish Marine Center located at or near 6361 1st Ave S, Seattle WA 98108-3228 (the "Facility"). The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Samson.

## **I. COMPLIANCE WITH STANDARDS.**

### **A. Violations of Water Quality Standards.**

Condition S10.A of the Permits prohibit discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric standards. Furthermore, narrative water quality standards apply with equal force, even when Ecology has established numeric water quality standards. Specifically, Condition S10.A of the Permits require Samson's discharges not cause or contribute to violations of Washington State's water quality standards.

Samson discharges stormwater to the Lower Duwamish Waterway. Samson discharges stormwater that contains elevated levels of copper, zinc, and turbidity as indicated in the table of discharge monitoring data below. Further, the data provided in the tables below represent samples collected from only one of Samson's discharge points. Discharges of stormwater and/or wastewater from the facility cause and/or contribute to violations of water quality standards for zinc, copper, oil sheen, and turbidity and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. These water quality standards include those set forth in WAC 173-201A-200(1)(e), -240, and -260(2). Precipitation data from the last five years are appended to this notice of intent to sue and identify days when precipitation met or exceed 0.1 inches per day.



**TABLE 1:  
DISCHARGE MONITORING REPORT ("DMR") DATA FOR SAMSON  
OUTFALL 1 (Bioswale)**

Quarter in which sample collected	Turbidity (Benchmark 25 NTU)	pH (Benchmark 5-9 su)	Zinc (Benchmark 117 µg/L)	Oil Sheen (Y/N)	Copper (Benchmark 14 µg/L)	Total Suspended Solids* (mg/L)	Diesel NWTPHDx (Benchmark <= 10 mg/L)	Notes
1Q 2010	<b>1000</b>	8.5	<b>703</b>	<b>Y</b>	<b>249</b>			
2Q 2010								
3Q 2010	<b>59.8</b>	8	<b>97.7</b>	N	<b>51.3</b>			No DMR
4Q 2010	<b>2000</b>	8	<b>4330</b>	N	<b>1640</b>			
1Q 2011	<b>923.4</b>	8	<b>362</b>	N	<b>122</b>			Late Submittal
2Q 2011	<b>763.4</b>	7.5	<b>676</b>	N	<b>180</b>			
3Q 2011	<b>1312</b>	6.5	<b>713</b>	N	<b>204</b>			
4Q 2011								Late Submittal
								Late Submittal, ND
1Q 2012	<b>670</b>	6.7	<b>315</b>	N	<b>120</b>			Late Submittal
2Q 2012	<b>3000</b>	8.6	<b>1060</b>	N	<b>365</b>			
3Q 2012								
4Q 2012	<b>3000</b>	8.7	<b>616</b>	N	<b>146</b>			ND
1Q 2013	12	8.2	23.8	N	5.12			
2Q 2013	<b>954</b>	8.4	<b>1680</b>	N	<b>399</b>			
3Q 2013								
4Q 2013	<b>226</b>	8.1	<b>817</b>	N	<b>172</b>			No DMR
1Q 2014	<b>294</b>	6.6	<b>520</b>	N	<b>136</b>			
2Q 2014	<b>188</b>	7.9	<b>168</b>	N	<b>54.9</b>			
3Q 2014								Late Submittal
4Q 2014								No DMR
1Q 2015	<b>&gt;3000</b>	8.5	<b>5490</b>	N	<b>1060</b>	<b>22300</b>	.925	No DMR
2Q 2015								
3Q 2015	4	6.7	12.9	N	6.71	<5	<1	ND

Key: Bold = benchmark exceedances; "ND" = Reported No Discharge; "NC" = Analysis not conducted.

\* Total Suspended Solids (TSS) - Reporting Only - On ISGP 303(d) TSS Compliance Schedule.

## **B. Compliance with Standards.**

Condition S10.C of the Permits requires Samson to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparing and implementing an adequate SWPPP and best management practices ("BMPs"). Samson has violated and continues to violate these conditions by failing to apply AKART to its discharges by, among other things, failing to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge. *See* Tables 1 and 2; Section II. These violations have occurred on each and every day for the previous five years and continue to occur every day.

Condition S1.A of the Permits require that all discharges and activities authorized be consistent with the terms and conditions of the permit. Samson has violated this condition by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

## **II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.**

Samson has not developed and implemented a SWPPP that complies with the requirements of the Permits. In the following section, upon information and belief, Soundkeeper asserts that the SWPPP and its implementation violate the Permits as follows.

Condition S3.A.1 of the Permits require Samson to develop and implement a SWPPP as specified in these permits. Condition S3.A.2 of the Permits require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Samson has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART and BMPs necessary to comply with state water quality standards.

Condition S3.A of the Permits require Samson to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. On information and belief, Samson has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, is not fully implemented, and has not been updated as necessary.

The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.B.4 of the 2015 Permit requires that the SWPPP detail how and where the selected BMPs will be implemented. Condition S3.A.3 of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical



manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Samson's SWPPP does not comply with these requirements because it does not adequately describe and explain in detail the BMPs selected, does not include BMPs consistent with approved stormwater technical manuals, and does not include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

Samson's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, the regular business hours, and the seasonal variations in business hours or in industrial activities.

Samson's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

Samson's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these permit conditions.

Samson's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for each material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.



Samson's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs and implement certain mandatory BMPs unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP are provided. Samson is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

Samson's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage and treatment facilities, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Samson will comply with signature and record retention requirements, certification of compliance with the SWPPP and Permit, and all inspection reports completed by Samson).

Samson's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

Samson's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Samson's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

Samson's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.



Samson's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

### **III. MONITORING AND REPORTING VIOLATIONS.**

#### **A. Failure to Collect Quarterly Samples.**

Condition S4.B of the Permits require Samson to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permits require Samson to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. Discharge points may include, but are not limited to drains, piers, docks, loading areas, and fueling areas where industrial activities occur. Conditions S3.B.5.b and S4.B.2.c set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met.

Samson violated these requirements by failing to collect stormwater samples at any of its discharge points during the following quarters:

- 1st Quarter 2010
- 2nd Quarter 2010
- 3rd Quarter 2010
- 4th Quarter 2010
- 1st Quarter 2011
- 2nd Quarter 2011
- 3rd Quarter 2011
- 4th Quarter 2011
- 1st Quarter 2012
- 2nd Quarter 2012
- 3rd Quarter 2012
- 4th Quarter 2012
- 1st Quarter 2013
- 2nd Quarter 2013
- 3rd Quarter 2013
- 4th Quarter 2013
- 1st Quarter 2014
- 2nd Quarter 2014
- 3rd Quarter 2014
- 4th Quarter 2014
- 1st Quarter 2015

2nd Quarter 2015  
3rd Quarter 2015  
4th Quarter 2015

These violations have occurred and continue to occur each and every quarter during the last five years that Samson was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not all, points of discharge. These violations will continue until Samson commences monitoring all distinct points of discharge and taking representative samples.

**B. Failure to Analyze Quarterly Samples.**

Conditions S5.A.1 and S5.B.1 of the Permits requires Samson to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, oil sheen, total suspended solids, and diesel (NWTPHDx).

Samson violated these conditions by failing to analyze stormwater samples from each distinct discharge point for any of the required parameters during the following quarters as further specified in table 1 above:

2nd Quarter 2010  
4th Quarter 2011  
3rd Quarter 2012  
3rd Quarter 2013  
3rd Quarter 2014  
4th Quarter 2014  
2nd Quarter 2015

**C. Failure to Timely Submit Discharge Monitoring Reports.**

Condition S9.A of the Permits require Samson to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Samson has violated these conditions by failing to timely submit a DMR within the time prescribed for the following quarters:

2nd Quarter 2010  
4th Quarter 2010 (Late)  
3rd Quarter 2011 (Late)  
4th Quarter 2011 (Late)  
3rd Quarter 2013  
2nd Quarter 2014 (Late)  
3rd Quarter 2014  
4th Quarter 2014



#### **D. Failure to Comply with Visual Monitoring Requirements.**

Condition S7.A of the Permits requires that monthly visual inspections be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Condition S7.C of the Permits requires that Samson record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits, a summary report and schedule of implementation of the remedial actions that Samson plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Samson is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists for each visual monitoring and inspection, and failed to make the requisite certifications and summaries for each visual monitoring and inspection.

#### **IV. CORRECTIVE ACTION VIOLATIONS.**

##### **A. Violations of the Level One Requirements of the Permits.**

Condition S8.B of the Permits requires Samson take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH. Condition S8.A of the 2015 Permit requires that Samson implement any Level One Corrective Action required by the 2010 Permit.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires Samson: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize the Level One Corrective



Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.4 of the Permits requires that Samson implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Tables 2 and 3 of the Permits establish the following benchmarks: turbidity 25 NTU; pH 5 – 9 SU; total copper 14 µg/L; total zinc 117 µg/L; and petroleum hydrocarbons (diesel fraction NWTPHDx) ≤10 mg/L.

Samson has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since January 1, 2010, that quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Tables 1 and 2 in Section I.A. of this letter.

These benchmark excursions are based upon information currently available to Soundkeeper from Ecology's publicly available records. Soundkeeper provides notice of its intent to sue Samson for failing to comply with all of the Level One Corrective Action requirements described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 above.

#### **B. Violations of the Level Two Requirements of the Permits.**

Condition S8.C of the Permits requires Samson take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any two quarters during a calendar year. Condition S8.A of the 2015 Permit requires that Samson implement any Level Two Corrective Action required by the 2010 Permit.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires Samson: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and sign and certify the revised SWPPP in accordance with Condition S3 of the Permits; and (3) summarize the Level Two Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permits. Condition S8.C.4 of the Permits requires that Samson implement the revised SWPPP according to Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than August 31st of the following year.

The Permits establish the benchmarks applicable to Samson described in Section IV.A of this notice of intent to sue letter.



Samson has violated the requirements of the Permits described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs to ensure that all points of discharge from the facility meet benchmarks (not just the sampled point of discharge), including additional structural source control BMPs, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any two quarters during a calendar year. As indicated in Table 1 in Section I.A of this letter, these violations include, but are not limited to, Samson's failure to fulfill these obligations for turbidity, zinc, and copper triggered by its stormwater sampling during the calendar year of 2010 and every year since.

The benchmark excursions identified in Table 1 of this notice of intent to sue letter are based upon information currently available to Soundkeeper from Ecology's publicly available records. Soundkeeper provides notice of its intent to sue Samson for failing to comply with all of the Level Two Corrective Action requirements each and every time quarterly stormwater sample results exceeded an applicable benchmark value or were outside the benchmark range for pH for any two quarters during a calendar year, including any such excursions that are not reflected in Table 1 above, during the last five years.

### **C. Violations of the Level Three Requirements of the Permits.**

Condition S8.D of the Permits requires Samson take specified actions, called a "Level Three Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any three quarters during a calendar year. Condition S8.A of the 2015 Permit requires that Samson implement any Level Three Corrective Action required by the 2010 Permit.

As described by Condition S8.D of the 2010 Permit, a Level Three Corrective Action requires that Samson: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize the Level Three Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the 2010 Permit, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed. Condition S8.D.2.b of the 2010 Permit requires that a licensed professional engineer, geologist, hydrogeologist, or certified professional in storm water quality must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the 2010 Permit requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, Samson submit an engineering report,



plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the 2010 Permit requires that Samson fully implement the revised SWPPP according to condition S3 of the 2010 Permit and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permits establishes the benchmarks applicable to Samson described in Section IV.A of this notice of intent to sue letter.

Samson has violated the requirements of the Permits described above by failing to conduct a Level Three Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, including the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment, the required implementation of additional BMPs, including additional treatment BMPs to ensure that all points of discharge from the facility meet benchmarks (not just the sampled point of discharge), the required submission of an engineering report, plans, specifications, and an operations and maintenance plan, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any three quarters during a calendar year. As indicated in Table 1 in Section I.A of this letter, these violations include, but are not limited to, Samson's failure to fulfill these obligations for turbidity, zinc, and copper triggered by its stormwater sampling during the calendar year of 2011.

The benchmark excursions identified in Table 1 of this notice of intent to sue letter are based upon information currently available to Soundkeeper from Ecology's publicly available records. Soundkeeper provides notice of its intent to sue Samson for failing to comply with all of the Level Three Corrective Action requirements each and every time quarterly stormwater sample results exceeded an applicable benchmark value or were outside the benchmark range for pH for any three quarters during a calendar year, including any such excursions that are not reflected in Table 1 above, during the last five years.

## **V. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.**

Condition S9.B of the Permits requires Samson to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Condition S8.B through S8.D. If a corrective action is not yet completed at the time of submission of the annual report, Samson must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective



actions triggered during the previous calendar year, including identification of the date Samson expects to complete corrective actions. Samson has violated this condition by failing to include all of the required information in the annual report it submitted for the past five years.

The annual report submitted by Samson for 2010 (submitted May 13, 2011) does not include the required information. The report describes problems and corrective actions from 2009. The annual report provides inadequate and incomplete information for the Level Three Corrective Action triggered (or ongoing) for turbidity, zinc and copper in 2010, including the description of the conditions triggering the corrective action, the BMPs (including treatment) to be implemented as part of the Level Three Corrective Action, and the implementation schedule. The annual report does not include information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed as required by Condition S8.D.4.

The annual report submitted by Samson for 2011 (submitted on May 11, 2012) does not include the required information. For example, the report does not describe all of the stormwater problems identified. The report does not describe the completion or status of the Level Three corrective actions triggered for exceeding benchmarks for turbidity, zinc and copper that was to be completed in 2011, or the information required by Condition S8.D.4 of the 2010 Permit for that Level Three Corrective Action. Samson's annual 2011 report provides inadequate and incomplete information on their corrective actions for three quarters of violations of turbidity, zinc and copper benchmarks in 2011. The annual report also does not include information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed as required by Condition S8.D.4.

The annual report submitted by Samson for 2012 (submitted late on May 10, 2013) does not include the required information. The report does not describe all of the stormwater problems identified. The report does not describe the completion or status of the Level Two and Level Three corrective actions triggered in prior years that was to be completed in 2011 and now states corrective actions to be completed in 2013. The report also fails to include the information required by Condition S8.D.4 of the 2010 Permit for that Level Three Corrective Action.

Samson failed to submit an annual report for 2013.

Samson failed to submit an annual report for 2014.

## **VI. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.**

### **A. Failure to Record Information.**

Condition S4.B.3 of the Permits requires Samson record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Samson collected the sample within the first 30 minutes of stormwater discharge



event, an explanation of why Samson could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, Samson is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

#### **B. Failure to Retain Records.**

Condition S9.C of the Permits requires Samson to retain for a minimum of five years a copy of the Permits, a copy of Samson's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permits. Upon information and belief, Samson is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

### **VII. PROHIBITED DISCHARGES.**

Condition S5.E. of the Permits prohibits illicit discharges and the discharge of process wastewater. Appendix 2 of the Permits defines "illicit discharges" to include "any *discharge* that is not composed entirely of *stormwater* except (1) discharges authorized pursuant to a separate NPDES permit, or (2) conditionally authorized non-stormwater discharge identified in Condition S5.D." Appendix 2 of the Permits defines stormwater as "that portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a stormwater drainage system into a defined surface water body, or a constructed infiltration facility." In contrast to stormwater, Appendix 2 of the Permits defines leachate as "water or other liquid that has percolated through raw material, product, or waste and contains substances in solution or suspension as a result of the contact with these materials," and process wastewater as "any non-stormwater which, during manufacturing or processing, comes into direct contact or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product."

On information and belief, Samson has violated and continues to violate these conditions due to its non-stormwater discharges from the Facility. These non-stormwater discharges from the Facility may include, but are not limited to, discharges of wash water from the wheel wash and/or other equipment washing areas.

### **VIII. REQUEST FOR SWPPP.**

Pursuant to Condition S9.F of the 2015 Permit, Soundkeeper hereby requests that Samson Inc. provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.



Should Samson fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit, it will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any ensuing lawsuit.

## **IX. CONCLUSION.**

The above-described violations reflect those indicated by the information currently available to Soundkeeper. These violations are ongoing. Soundkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

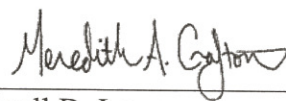
Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to \$37,500 per day for each violation. In addition to civil penalties, Soundkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 USC § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Soundkeeper believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. Soundkeeper intends, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Samson under Section 505(a) of the Clean Water Act for the violations described herein.

Soundkeeper is willing to discuss effective remedies for the violations described in this letter and settlement terms during the 60-day notice period. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within ten (10) days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By:   
Knoll D. Lowney  
Meredith A. Crafton

cc: Gina McCarthy, Administrator, U.S. EPA  
Dennis McLerran, Region 10 Administrator, U.S. EPA  
Maia Bellon, Director, Washington Department of Ecology  
Registered Agent, Gerald Morgan, 6361 1st Ave S, Seattle WA 98108





Date Precip. (in) Events

Date Precip. (in) Events

Date Precip. (in) Events

2010	Precip. (in)	Events
Jan	sum	
1	0.39	Rain
2	0.05	Rain
3	0.02	Rain
4	0.82	Rain
5	0.09	Rain
6	0	
7	0.03	Rain
8	0.91	Rain
9	0.07	Rain
10	0.1	Rain
11	1.03	Rain
12	0.63	Rain
13	0.39	Rain
14	0.31	Rain
15	0.52	Rain
16	0.02	Fog, Rain
17	0.12	Rain
18	0	Rain
19	0.02	Rain
20	0.01	
21	0	
22	0	
23	0.01	Rain
24	0.35	Rain
25	0.12	Rain
26	0	
27	0	Fog
28	0	
29	0.02	Rain
30	0.2	Rain
31	0.06	Rain
2010	Precip. (in)	Events
Feb	sum	
1	0.06	Fog, Rain
2	0.02	Rain
3	0.27	Rain

4	0.08	Rain
5	0.08	Rain
6	0.24	Rain
7	0.09	Rain
8	0	Rain
9	0	Fog
10	0.08	Fog, Rain
11	0.23	Rain
12	0.43	Rain
13	0.23	Rain
14	0.66	Rain
15	0.04	Fog, Rain
16	0.19	Rain
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0.14	Rain
24	0.11	Rain
25	0.06	Rain
26	0.49	Rain
27	0.09	Rain
28	0	
2010	Precip. (in)	Events
Mar	sum	
1	0	
2	0.06	Rain
3	0	
4	0	Rain
5	0	
6	0	
7	0.05	Rain
8	0.04	Rain
9	0	Rain
10	0.03	Rain
11	0.49	Rain
12	0.57	Rain

13	0.01	Rain
14	0	Rain
15	0.01	Rain
16	0.06	Rain
17	0.01	
18	0	
19	0	
20	0	
21	0.03	Rain
22	0	Rain
23	0	
24	0	
25	0.43	Rain
26	0	
27	0	
28	0.65	Rain
29	0.83	Rain, Thunderstorm
30	0.08	Rain
31	0.01	
2010	Precip. (in)	Events
Apr	sum	
1	0.08	Rain
2	0.68	Rain
3	0.17	Rain
4	0.08	Rain
5	0.14	Rain
6	0	
7	0.11	Rain
8	0.09	Rain
9	0.07	Rain
10	0	
11	0	
12	0	
13	0.08	Rain
14	0	
15	0	Rain
16	0.01	Rain
17	0.18	Rain

Date Precip. (in) Events

18	0.01	
19	0	
20	0.01	Rain
21	0.65	Rain
22	0	
23	0.11	Rain
24	0.01	Rain
25	0	
26	0.29	Rain
27	0.29	Rain
28	0.26	Rain
29	0	
30	0.03	Rain
2010	Precip. (in)	Events
May	sum	
1	0	Rain
2	0.08	Rain
3	0.09	Rain
4	0.44	Rain
5	0.2	Rain
6	0	
7	0	
8	0	
9	0	
10	0.16	Rain
11	0.01	
12	0	
13	0	
14	0	
15	0	
16	0	Rain
17	0.01	
18	0.18	Rain
19	0.28	Rain
20	0.13	Rain
21	0.04	Rain
22	0.09	Rain
23	0.18	Rain
24	0	
25	0.07	Rain

Date Precip. (in) Events

26	0.28	Rain
27	0.04	Rain
28	0.3	Rain
29	0.04	Rain
30	0.08	Rain
31	0.22	Rain
2010	Precip. (in)	Events
Jun	sum	
1	0.07	Rain
2	0.21	Rain
3	0.01	Rain
4	0.29	Rain
5	0.04	Rain
6	0.26	Rain
7	0.06	Rain
8	0.23	Rain
9	0.22	Rain
10	0.08	Rain
11	0.01	Rain
12	0	
13	0	
14	0	
15	0.17	Rain
16	0.22	Rain
17	0	
18	0	
19	0.03	Rain
20	0.17	Rain
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	Rain
28	0	
29	0	
30	0	
2010	Precip. (in)	Events

Date Precip. (in) Events

Jul	sum	
1	0.02	Rain
2	0.17	Rain
3	0	
4	0.07	Rain
5	0	Rain
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	Rain
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	Fog
31	0	
2010	Precip. (in)	Events
Aug	sum	
1	0	
2	0	
3	0	
4	0	
5	0.04	Rain
6	0	



Date	Precip. (in)	Events
7	0.16	Rain
8	0.01	Rain
9	0	Rain
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0.01	Rain
22	0	Rain
23	0	
24	0	
25	0	
26	0	Rain
27	0	
28	0	
29	0	
30	0	
31	0.37	Rain
<b>2010</b>	<b>Precip. (in)</b>	<b>Events</b>
Sep	sum	
1	0	
2	0	
3	0	
4	0.02	Rain
5	0	
6	0.12	Rain
7	0.01	Rain
8	0.25	Rain
9	0.02	Rain
10	0	
11	0	
12	0	
13	0	

Date	Precip. (in)	Events
14	0	
15	0.21	Rain
16	0.44	Rain
17	0.7	Fog, Rain
18	0.91	Rain
19	0.63	Rain
20	0	Rain
21	0	
22	0	
23	0.2	Rain
24	0.03	Rain
25	0	
26	0.27	Rain
27	0.04	Rain
28	0.01	Rain
29	0	
30	0	
<b>2010</b>	<b>Precip. (in)</b>	<b>Events</b>
Oct	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0.01	
7	0	
8	0.08	Rain
9	1.01	Rain
10	0.92	Rain
11	0	
12	0	
13	0.01	
14	0.13	Rain
15	0	Rain
16	0	
17	0	
18	0	
19	0	
20	0.01	

Date	Precip. (in)	Events
21	0.01	Rain
22	0.13	Rain
23	0.45	Rain
24	0.68	Rain
25	0.41	Rain
26	0.17	Rain
27	0	
28	0.09	Rain
29	0.03	Rain
30	0.41	Rain
31	0.06	Rain
<b>2010</b>	<b>Precip. (in)</b>	<b>Events</b>
Nov	sum	
1	1.35	Rain
2	0	
3	0	
4	0	
5	0.07	Rain
6	0.69	Rain
7	0.03	Rain
8	0	
9	0.19	Rain
10	0	
11	0.08	Rain
12	0	
13	0.12	Rain
14	0.34	Rain
15	0.04	Rain
16	0	
17	0.12	Rain
18	0.14	Rain
19	0.08	Rain
20	0.01	Rain
21	0	Snow
22	0.07	Fog, Snow
23	0	Rain, Snow
24	0	
25	0.01	Snow
26	0.39	Rain

Date Precip. (in) Events

27	0.01	
28	0.05	Rain
29	0.09	Rain
30	0.69	Rain
<b>2010</b>	<b>Precip. (in)</b>	<b>Events</b>
Dec	sum	
1	0	
2	0.01	Fog, Rain
3	0	
4	0	
5	0	
6	0	
7	0.47	Rain
8	0.74	Rain
9	0.99	Rain
10	0	
11	1.37	Rain
12	2.24	Rain
13	0.34	Rain
14	0.57	Rain
15	0.09	Rain
16	0.02	Rain
17	0	
18	0.13	Rain
19	0.14	Rain
20	0.07	Rain
21	0.04	Rain
22	0.02	Rain
23	0.43	Rain
24	0.44	Rain
25	0.28	Rain
26	0.24	Rain
27	0.46	Rain
28	0	Rain
29	0	Rain
30	0	
31	0	
<b>2011</b>	<b>Precip. (in)</b>	<b>Events</b>
Jan	sum	

Date Precip. (in) Events

1	0	
2	0	
3	0	
4	0.03	Rain
5	0.11	Rain
6	0.28	Rain
7	0.52	Rain
8	0.01	
9	0.03	Rain
10	0	
11	0.12	Fog, Snow
12	0.74	Rain, Snow
13	0.66	Rain
14	0.08	Rain
15	0.42	Rain
16	0.11	Rain
17	0	Rain
18	0.08	Rain
19	0	
20	0.05	Rain
21	0.68	Rain
22	0	
23	0.04	Rain
24	0.26	Rain
25	0	
26	0	
27	0	Fog
28	0.07	Rain
29	0.26	Rain
30	0	
31	0	
<b>2011</b>	<b>Precip. (in)</b>	<b>Events</b>
Feb	sum	
1	0	Rain
2	0	
3	0.02	Rain
4	0.06	Rain
5	0.09	Rain
6	0.11	Rain

Date Precip. (in) Events

7	0.06	Rain
8	0.01	
9	0	
10	0	
11	0	
12	0.45	Rain
13	0.28	Rain
14	0.84	Rain
15	0.15	Rain
16	0.04	Rain
17	0.02	Rain
18	0	
19	0	
20	0	
21	0.06	
22	0.2	Rain, Snow
23	0.08	Fog, Snow
24	0.01	Snow
25	0	
26	0	Snow
27	0.51	Rain
28	0.22	Rain
<b>2011</b>	<b>Precip. (in)</b>	<b>Events</b>
Mar	sum	
1	0.22	Rain
2	0.14	Rain
3	0.35	Rain
4	0.12	Rain
5	0	Rain
6	0	
7	0	Rain
8	0.1	Rain
9	1.47	Rain
10	0.41	Rain
11	0	
12	0.47	Rain
13	0.65	Rain
14	0.3	Rain



Date	Precip. (in)	Events	Date	Precip. (in)	Events	Date	Precip. (in)	Events
15	0.43	Rain, Thunderstorm	19	0		27	0.09	Rain
16	0.22	Rain	20	0		28	0	Rain
17	0		21	0.04	Rain	29	0	
18	0.18	Rain	22	0		30	0	
19	0		23	0		31	0.06	Rain
20	0.01	Rain	24	0.05	Rain	2011	Precip. (in)	Events
21	0.01	Rain	25	0.45	Rain	Jun	sum	
22	0		26	0.03	Rain	1	0.24	Rain
23	0		27	0.44	Rain	2	0.25	Rain
24	0.04	Rain	28	0.04	Rain	3	0	
25	0.11	Rain	29	0.04	Rain	4	0	
26	0.08	Fog, Rain	30	0.17	Rain	5	0	
27	0.19	Rain	2011	Precip. (in)	Events	6	0	
28	0.11	Rain	May	sum		7	0.1	Rain
29	0.13	Rain	1	0		8	0	Rain
30	0.09	Rain	2	0.22	Rain	9	0	
31	0.11	Rain	3	0	Rain	10	0	
2011	Precip. (in)	Events	4	0		11	0	
Apr	sum		5	0.04	Rain	12	0	Rain
1	0.85	Rain	6	0.12	Rain	13	0.03	Rain
2	0.25	Rain	7	0.04	Rain	14	0	
3	0.07	Rain	8	0.17	Rain	15	0.11	Rain
4	0.12	Rain	9	0		16	0	
5	0.15	Rain	10	0		17	0	
6	0.1	Rain	11	0.51	Rain	18	0.3	Rain
7	0.09	Rain	12	0		19	0.03	Rain
8	0		13	0		20	0	Rain
9	0		14	0.52	Rain	21	0	
10	0.09	Rain	15	0.69	Rain	22	0	
11	0.04	Rain	16	0		23	0.01	Rain
12	0		17	0	Fog	24	0.12	Rain
13	0.07	Rain	18	0		25	0	
14	0.39	Rain	19	0		26	0	
15	0.02	Rain	20	0		27	0	Rain
16	0.15	Rain	21	0.1	Rain	28	0	
17	0		22	0	Rain	29	0	
18	0.02		23	0		30	0	
			24	0		2011	Precip. (in)	Events
			25	0.24	Rain	Jul	sum	
			26	0.04	Rain			

Date	Precip. (in)	Events
1	0	
2	0	
3	0	Rain
4	0	
5	0	
6	0	
7	0.01	Rain
8	0	
9	0	
10	0	
11	0	Rain
12	0.09	Rain
13	0.01	
14	0	Rain
15	0.04	Rain
16	0.33	Rain
17	0.06	Rain
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0.27	Rain
26	0	
27	0	Rain
28	0	
29	0	
30	0	
31	0	
<b>2011</b>	<b>Precip. (in)</b>	<b>Events</b>
Aug	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	

Date	Precip. (in)	Events
8	0	
9	0	
10	0	
11	0	
12	0	Rain
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0.08	Rain
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	Rain
31	0	
<b>2011</b>	<b>Precip. (in)</b>	<b>Events</b>
Sep	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	

Date	Precip. (in)	Events
15	0	
16	0	
17	0.21	Rain
18	0.13	Rain
19	0.06	Rain
20	0	
21	0	
22	0	
23	0	
24	0	
25	0.22	Rain
26	0.32	Rain
27	0.04	Rain
28	0.01	
29	0	
30	0.02	
<b>2011</b>	<b>Precip. (in)</b>	<b>Events</b>
Oct	sum	
1	0	
2	0.14	Rain
3	0.09	Rain
4	0.02	Rain
5	0.1	Rain
6	0.19	Rain
7	0.05	Rain
8	0.01	Rain
9	0.06	Rain
10	0.18	Rain
11	0.57	Rain
12	0.01	Rain
13	0	
14	0.01	
15	0	
16	0	
17	0	
18	0	
19	0	Rain
20	0	
21	0.03	Rain
22	0.28	Rain



Date	Precip. (in)	Events	Date	Precip. (in)	Events	Date	Precip. (in)	Events
23	0		29	0.05	Rain	3	0.03	Rain
24	0.02	Rain	30	0		4	0.65	Rain
25	0	Fog	2011	Precip. (in)	Events	5	0.08	Rain
26	0.01	Rain	Dec	sum		6	0.04	Rain
27	0	Fog	1	0	Fog	7	0	Rain
28	0.38	Rain	2	0	Rain	8	0	
29	0		3	0		9	0.17	Rain
30	0.14	Rain	4	0		10	0.06	Rain
31	0		5	0	Fog	11	0	
2011	Precip. (in)	Events	6	0	Fog	12	0	
Nov	sum		7	0		13	0	
1	0		8	0		14	0.13	Rain
2	0.42	Fog, Rain	9	0		15	0.23	Fog, Snow
3	0		10	0.01	Rain	16	0.07	Rain, Snow
4	0.06	Rain	11	0.05	Rain	17	0.09	Rain
5	0		12	0	Fog	18	0.44	Fog, Rain, Snow
6	0	Fog	13	0	Fog	19	0.32	Rain, Snow
7	0.01	Rain	14	0.01	Rain	20	0.39	Rain
8	0		15	0.03	Rain	21	0.06	Rain
9	0	Rain	16	0		22	0.29	Rain
10	0		17	0	Fog	23	0	
11	0.3	Rain	18	0.08	Rain	24	0.24	Rain
12	0.15	Rain	19	0	Fog	25	0.4	Rain
13	0.09	Rain	20	0		26	0.31	Rain
14	0		21	0	Fog	27	0	
15	0		22	0	Fog	28	0	
16	0.38	Rain	23	0.01	Rain	29	0.67	Rain
17	0.1	Rain	24	0.01	Rain	30	0.11	Rain
18	0.01	Rain	25	0.04	Rain	31	0.04	Rain
19	0		26	0.03	Rain	2012	Precip. (in)	Events
20	0		27	0.03	Rain	Feb	sum	
21	0.42	Rain	28	0.47	Rain	1	0.45	Rain
22	1.58	Rain	29	0.21	Rain	2	0	
23	1	Rain	30	0.02	Rain	3	0	
24	0.35	Rain	31	0		4	0	
25	0		2012	Precip. (in)	Events	5	0	
26	0.03	Rain	Jan	sum				
27	0.33	Rain	1	0				
28	0	Rain	2	0.48	Rain			

Date	Precip. (in)	Events
6	0	
7	0	Rain
8	0.1	Rain
9	0.11	Rain
10	0.09	Rain
11	0	
12	0.04	Rain
13	0.44	Rain
14	0.04	Rain
15	0	
16	0.04	Rain
17	0.4	Rain
18	0.18	Rain
19	0	
20	0	Rain
21	0	Rain
22	0.22	Rain
23	0	
24	0.49	Rain
25	0.01	
26	0	
27	0	
28	0.18	Rain, Snow
29	0.08	Rain, Snow
<b>2012</b>	<b>Precip. (in)</b>	<b>Events</b>
Mar	sum	
1	0	
2	0.04	Rain
3	0	
4	0	
5	0.36	Rain
6	0.05	Snow
7	0	
8	0	
9	0.17	Rain
10	0.46	Rain
11	0.31	Rain
12	0.66	Rain

Date	Precip. (in)	Events
13	0.23	Rain, Snow
14	0.44	Rain
15	1.07	Rain
16	0.19	Rain
17	0.44	Rain, Snow
18	0.08	Rain
19	0.03	Rain
20	0.12	Rain
21	0	Rain*
22	0.16	Rain
23	0	
24	0	
25	0	
26	0	
27	0.21	Rain
28	0.15	Rain
29	1.15	Rain
30	0.08	Rain
31	0	Rain
<b>2012</b>	<b>Precip. (in)</b>	<b>Events</b>
Apr	sum	
1	0	Rain
2	0	
3	0	Rain
4	0	
5	0	Rain
6	0	
7	0	
8	0	
9	0	
10	0	Rain
11	0.08	Rain
12	0	
13	0	
14	0	
15	0	
16	0.24	Rain
17	0.07	Rain
18	0.09	Rain

Date	Precip. (in)	Events
19	0.28	Rain
20	0.26	Rain
21	0	
22	0	
23	0	
24	0.03	Rain
25	0.41	Rain
26	0.16	Rain
27	0.01	Rain
28	0	Rain
29	0.08	Rain
30	0.26	Rain
<b>2012</b>	<b>Precip. (in)</b>	<b>Events</b>
May	sum	
1	0.05	Rain
2	0	
3	0.78	Rain
4	0.32	Rain
5	0	
6	0	
7	0	
8	0	
9	0.01	Rain
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0.47	Rain
18	0	
19	0	
20	0.16	Rain
21	0.41	Rain
22	0.12	Rain
23	0.02	Rain
24	0.01	Rain
25	0.05	
26	0	



Date Precip. (in) Events

27	0	
28	0	
29	0	
30	0.02	Rain
31	0.15	Rain
<b>2012</b>	<b>Precip. (in)</b>	<b>Events</b>
Jun	sum	
1	0.1	Rain
2	0.02	Rain
3	0	
4	0.03	Rain
5	0.49	Rain
6	0	
7	0.54	Rain
8	0.05	Rain, Thunderstorm
9	0.02	
10	0	
11	0	
12	0.03	Rain
13	0	
14	0	
15	0	
16	0	Rain
17	0	
18	0.21	Rain
19	0.03	Rain
20	0	
21	0	
22	0.31	Rain
23	0.6	Rain
24	0.01	
25	0	Rain
26	0.01	Rain
27	0	
28	0	Rain
29	0	Rain
30	0	Rain

Date Precip. (in) Events

<b>2012</b>	<b>Precip. (in)</b>	<b>Events</b>
Jul	sum	
1	0	Rain
2	0	Rain
3	0	Rain
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	Thunderstorm
14	0	
15	0	
16	0	
17	0	Rain
18	0	
19	0	
20	0.61	Rain, Thunderstorm
21	0	
22	0	Rain
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	
<b>2012</b>	<b>Precip. (in)</b>	<b>Events</b>
Aug	sum	

Date Precip. (in) Events

1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	
<b>2012</b>	<b>Precip. (in)</b>	<b>Events</b>
Sep	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	

Date	Precip. (in)	Events
8	0	
9	0	
10	0.02	Rain
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	Fog
21	0	
22	0.02	Rain
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	Rain
30	0	
<b>2012</b>	<b>Precip. (in)</b>	<b>Events</b>
Oct	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0.09	Rain
13	0.09	Rain
14	0.52	Rain
15	0.22	Rain

Date	Precip. (in)	Events
16	0	
17	0	
18	0.64	Rain
19	0.1	Rain
20	0.18	Rain, Thunderstorm
21	0.14	Rain
22	0.26	Rain
23	0	Rain
24	0.19	Rain
25	0	
26	0.06	Rain
27	0.75	Rain
28	0.26	Rain
29	0.57	Rain
30	1.2	Rain
31	0.64	Rain
<b>2012</b>	<b>Precip. (in)</b>	<b>Events</b>
Nov	sum	
1	0.34	Rain
2	0.19	Rain
3	0.02	Rain
4	0.17	Rain
5	0.05	Rain
6	0.01	
7	0	
8	0	
9	0	
10	0	
11	0.55	Rain
12	0.13	Rain
13	0.19	Rain
14	0	
15	0	Fog
16	0.25	Fog, Rain
17	0.2	Rain
18	0.63	Rain
19	2.49	Rain

Date	Precip. (in)	Events
20	0.22	Rain
21	0.52	Rain
22	0.02	Rain
23	0.95	Rain
24	0	Rain
25	0	Fog
26	0	
27	0	
28	0.12	Rain
29	0.11	Rain
30	1.51	Rain
<b>2012</b>	<b>Precip. (in)</b>	<b>Events</b>
Dec	sum	
1	0.28	Rain
2	1	Rain
3	0.41	Rain
4	0.46	Rain
5	0.02	Rain
6	0.07	Rain
7	0.14	Rain
8	0	
9	0.06	Rain
10	0	
11	0.1	Rain
12	0.28	Rain
13	0.08	Rain
14	0.25	Rain
15	0.24	Rain
16	0.92	Rain
17	0.11	Rain
18	0.05	Rain, Snow
19	0.99	Rain, Snow
20	0.64	Rain
21	0.07	Fog, Rain
22	0.12	Rain
23	0.39	Rain
24	0.08	Rain
25	0.41	Rain



Date	Precip. (in)	Events	Date	Precip. (in)	Events	Date	Precip. (in)	Events
26	0.25	Rain	2013	Precip. (in)	Events	8	0	Fog
27	0.27	Rain				9	0	Fog
28	0	Rain				10	0.01	Rain
29	0.06	Rain				11	0.03	Rain
30	0	Fog				12	0.01	Rain
31	0					13	0.15	Rain
2013	Precip. (in)	Events				14	0.05	Rain
Jan	sum					15	0	
1	0					16	0.04	Rain
2	0					17	0	
3	0.18	Rain	Feb	sum		18	0	Rain
4	0.07	Rain	1	0		19	0.37	Rain
5	0.1	Rain	2	0	Fog	20	0.72	Rain
6	0.03	Rain	3	0.08	Rain	21	0.1	Rain
7	0.02	Rain	4	0		22	0.01	Rain
8	0.53	Rain	5	0.18	Rain	23	0	
9	1.15	Rain	6	0.08	Rain	24	0	
10	0	Fog, Rain	7	0.09	Rain	25	0	
11	0	Fog	8	0		26	0	
12	0		9	0.01	Rain	27	0.01	Rain
13	0		10	0	Fog	28	0.06	Rain
14	0		11	0.01	Rain	29	0.01	Rain
15	0		12	0		30	0	
16	0	Fog	13	0		31	0	
17	0	Fog	14	0.03	Rain	2013	Precip. (in)	Events
18	0	Fog	15	0		Apr	sum	
19	0	Fog	16	0	Rain	1	0	
20	0	Fog	17	0		2	0	
21	0	Fog	18	0	Rain	3	0	
22	0	Fog	19	0		4	0.41	Rain
23	0.21	Rain	20	0.07	Rain	5	0.44	Rain
24	0.16	Rain	21	0.01	Rain	6	0.44	Rain
25	0.09	Rain	22	0.34	Rain	7	0.96	Rain
26	0.16	Rain	23	0		8	0.04	Rain
27	0.01	Rain	24	0.02	Rain	9	0	
28	0.21	Rain	25	0.14	Rain	10	0.15	Rain
29	0.29	Rain	26	0.01	Rain	11	0.09	Rain
30	0.06	Rain	27	0.32	Rain	12	0.18	Rain
31	0.08	Rain	28	0.25	Rain	13	0.31	Rain
			2013	Precip. (in)	Events	14	0.06	Rain
			Mar	sum				
			1	0.04	Rain			
			2	0.21	Rain			
			3	0				
			4	0				
			5	0				
			6	0.61	Rain			
			7	0.26	Rain			

Date	Precip. (in)	Events
15	0	
16	0.07	Rain
17	0	
18	0.18	Rain
19	0.67	Rain
20	0.01	Rain
21	0.03	Rain
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	Rain
28	0.08	Rain
29	0.15	Rain
30	0	
2013	Precip. (in)	Events
May	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0.08	Rain
13	0.11	Rain, Thunderstorm
14	0	
15	0.03	Rain
16	0	Rain
17	0.02	Rain
18	0	
19	0	
20	0	

Date	Precip. (in)	Events
21	0.39	Rain
22	0.21	Rain
23	0.08	Rain
24	0.02	Rain
25	0	Rain
26	0.08	Rain
27	0.2	Rain
28	0.01	Rain
29	0.17	Rain
30	0	
31	0	
2013	Precip. (in)	Events
Jun	sum	
1	0	
2	0	Rain
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	Rain
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	Rain
20	0	Rain
21	0.01	Rain
22	0	
23	0	Rain
24	0.01	Rain
25	0.01	Rain, Thunderstorm

Date	Precip. (in)	Events
26	0.56	Rain
27	0.13	Rain
28	0	
29	0	
30	0	
2013	Precip. (in)	Events
Jul	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	Rain
17	0	Rain
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	Thunderstorm



Date	Precip. (in)	Events	Date	Precip. (in)	Events	Date	Precip. (in)	Events
<b>2013</b>	<b>Precip. (in)</b>	<b>Events</b>						
Aug	sum		1	0		4	0.01	Fog
1	0		2	0		5	0	Fog
2	0	Rain	3	0.12	Rain	6	0.04	Rain
3	0		4	0	Rain	7	0.1	Rain
4	0		5	0.46	Rain, Thunderstorm	8	0.39	Rain, Thunderstorm
5	0		6	1.08	Rain	9	0	
6	0		7	0	Rain	10	0.03	Rain
7	0		8	0.01		11	0.53	Rain
8	0		9	0		12	0.06	Rain
9	0		10	0		13	0	
10	0	Rain, Thunderstorm	11	0		14	0.01	Fog
11	0		12	0		15	0	Fog
12	0		13	0		16	0	
13	0		14	0		17	0.01	
14	0	Rain	15	0.21	Rain, Thunderstorm	18	0	Fog
15	0	Rain	16	0		19	0	Fog
16	0		17	0		20	0	
17	0		18	0		21	0	
18	0		19	0		22	0	Fog
19	0		20	0.15	Rain	23	0.01	Fog
20	0		21	0.01		24	0.01	Fog
21	0		22	0.37	Rain	25	0	
22	0		23	0.08	Rain	26	0.01	Fog
23	0		24	0.01		27	0.06	Rain
24	0		25	0.04	Rain	28	0	
25	0		26	0.01	Fog	29	0	
26	0	Rain	27	0.05	Rain	30	0.01	Rain
27	0	Rain	28	1.21	Rain	31	0.01	Rain
28	0	Rain	29	0.62	Rain	<b>2013</b>	<b>Precip. (in)</b>	<b>Events</b>
29	0.38	Rain, Thunderstorm	30	0.63	Rain	Nov	sum	
30	0		<b>2013</b>	<b>Precip. (in)</b>	<b>Events</b>	1	0	Rain
31	0		Oct	sum		2	0.38	Rain
<b>2013</b>	<b>Precip. (in)</b>	<b>Events</b>	1	0.08	Rain	3	0.02	Rain
Sep	sum		2	0.19	Rain	4	0.01	Rain
			3	0.02	Rain	5	0.05	Rain
						6	0.09	Rain
						7	0.94	Rain
						8	0	

Date	Precip. (in)	Events
9	0.09	Rain
10	0	Rain
11	0	
12	0.14	Rain
13	0	
14	0.01	Rain
15	0.08	Rain
16	0	
17	0.05	Rain
18	0.8	Rain
19	0.11	Rain
20	0	
21	0	
22	0	
23	0.08	
24	0	
25	0	Fog
26	0	Fog, Rain
27	0	
28	0	Fog
29	0.01	Fog
30	0.06	Rain
<b>2013</b>	<b>Precip. (in)</b>	<b>Events</b>
Dec	sum	
1	0.03	Rain
2	0.11	Rain
3	0.01	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	Snow
10	0	
11	0	Fog
12	0.22	Fog, Rain
13	0.01	
14	0	
15	0.03	Rain

Date	Precip. (in)	Events
16	0	Fog
17	0	
18	0.04	Rain
19	0	
20	0.1	Rain, Snow
21	0.22	Rain
22	0.21	Rain
23	0.01	Rain
24	0	
25	0	Fog
26	0	Fog
27	0.03	Fog, Rain
28	0	Fog
29	0	Fog
30	0.02	Rain
31	0.01	Fog
<b>2014</b>	<b>Precip. (in)</b>	<b>Events</b>
Jan	sum	
1	0.01	Fog, Rain
2	0.53	Rain
3	0.03	Rain
4	0	
5	0	Fog
6	0	
7	0.34	Rain
8	0.44	Rain
9	0.09	Rain
10	0.15	Rain
11	0.91	Rain
12	0.02	Rain
13	0.01	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	

Date	Precip. (in)	Events
21	0	Fog
22	0	
23	0	
24	0	Fog
25	0	Fog
26	0	Fog
27	0	Fog
28	0.35	Rain
29	0.77	Rain
30	0.01	
31	0.03	Rain
<b>2014</b>	<b>Precip. (in)</b>	<b>Events</b>
Feb	sum	
1	0.02	Fog, Rain
2	0	Fog
3	0	
4	0	
5	0	
6	0	
7	0	
8	0.09	Snow
9	0.01	Rain, Snow
10	0.54	Rain
11	0.75	Rain
12	0.14	Rain
13	0	Rain
14	0.41	Rain
15	0.51	Rain
16	1.41	Rain
17	0.44	Rain
18	0.62	Rain
19	0.02	Rain
20	0.03	Rain
21	0.23	Rain
22	0.09	Rain
23	0.18	Rain
24	0.39	Rain
25	0	
26	0	



Date	Precip. (in)	Events
27	0	
28	0	
<b>2014</b>	<b>Precip. (in)</b>	<b>Events</b>
Mar	sum	
1	0.01	Rain
2	0.7	Rain
3	0.37	Rain
4	0.41	Rain
5	1.44	Rain
6	0.21	Rain
7	0	
8	1.12	Rain
9	0.26	Rain
10	0.44	Rain
11	0	
12	0	Fog
13	0	Rain
14	0.11	Rain
15	0.2	Rain
16	1.09	Rain
17	0.01	
18	0.01	
19	0	Rain
20	0	Rain
21	0	
22	0	
23	0	
24	0	
25	0.22	Rain
26	0.06	Rain
27	0.03	Rain
28	0.51	Rain
29	0.63	Rain
30	0.02	
31	0	
<b>2014</b>	<b>Precip. (in)</b>	<b>Events</b>
Apr	sum	
1	0	
2	0	

Date	Precip. (in)	Events
3	0.11	Rain
4	0	Rain
5	0.08	Rain
6	0	
7	0	
8	0.37	Rain
9	0.01	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0.01	Rain
16	0.41	Rain
17	0.7	Rain
18	0	
19	0.36	Rain
20	0	
21	0.14	Rain
22	0.53	Rain
23	0.22	Rain
24	0.3	Rain
25	0.05	
26	0.18	Rain
27	0	Rain
28	0	
29	0	
30	0	
<b>2014</b>	<b>Precip. (in)</b>	<b>Events</b>
May	sum	
1	0	
2	0	Rain
3	1.19	Rain
4	0.26	Rain
5	0.24	Rain
6	0	
7	0	
8	0.32	Rain
9	0.07	Rain
10	0	

Date	Precip. (in)	Events
11	0.01	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0.04	Rain
19	0	
20	0	
21	0	
22	0	
23	0.16	Rain
24	0	
25	0.27	Rain
26	0.01	
27	0	Rain
28	0.03	Rain
29	0	
30	0	
31	0	
<b>2014</b>	<b>Precip. (in)</b>	<b>Events</b>
Jun	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	Rain
13	0.03	Rain
14	0	Rain
15	0.01	Rain
16	0.11	Rain
17	0.05	Rain

Date	Precip. (in)	Events
18	0	
19	0	Rain
20	0	Rain
21	0	
22	0	
23	0	Rain
24	0	
25	0	
26	0	Rain
27	0	Rain
28	0	Rain
29	0	
30	0	
2014	Precip. (in)	Events
Jul	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	Rain
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	Rain
22	0	
23	0	Rain
24	0	Rain
25	0	

Date	Precip. (in)	Events
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	
2014	Precip. (in)	Events
Aug	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	Rain
12	0	Rain
13	0	Rain
14	0	Rain
15	0	Rain
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	Rain
31	0	Rain

Date	Precip. (in)	Events
2014	Precip. (in)	Events
Sep	sum	
1	0	Rain
2	0	Rain
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	Rain
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	Rain
18	0	Rain
19	0	
20	0	
21	0	
22	0	
23	0	Rain
24	0.66	Rain
25	0.27	Rain
26	0.09	Rain
27	0	
28	0	
29	0	Fog, Rain
30	0	Rain
2014	Precip. (in)	Events
Oct	sum	
1	0	
2	0	
3	0	
4	0	
5	0	



Date	Precip. (in)	Events
6	0	
7	0	
8	0	
9	0	
10	0	Fog, Rain
11	0	Rain
12	0	Rain
13	0	Rain
14	0.11	Rain
15	0.45	Rain
16	0	Rain
17	0.14	Rain
18	0.31	Rain
19	0	
20	0.44	Rain
21	0.1	Rain
22	1.43	Rain
23	0.35	Rain
24	0.13	Rain
25	0.37	Rain
26	0.05	Rain
27	0.01	Rain
28	0.34	Rain
29	0.04	Rain
30	0.67	Rain
31	0.77	Rain
<b>2014</b>	<b>Precip. (in)</b>	<b>Events</b>
Nov	sum	
1	0	
2	0.11	Rain
3	0.24	Rain
4	0.05	Rain
5	0.27	Rain
6	0.22	Rain
7	0	
8	0	
9	0.29	Rain
10	0	
11	0	

Date	Precip. (in)	Events
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	Rain
20	0.11	Rain
21	0.67	Rain
22	0.03	Rain
23	0.42	Rain
24	0.01	Rain
25	0.33	Rain
26	0.01	Rain
27	0.04	Rain
28	1.39	Rain
29	0.06	Rain, Snow
30	0	
<b>2014</b>	<b>Precip. (in)</b>	<b>Events</b>
Dec	sum	
1	0	
2	0	
3	0	
4	0.05	Rain
5	0.09	Rain
6	0.25	Rain
7	0	Fog
8	0.45	Rain
9	0.42	Rain
10	0.5	Rain
11	0.33	Rain
12	0	
13	0.01	
14	0	Fog
15	0	
16	0	Rain
17	0.16	Rain
18	0.6	Rain

Date	Precip. (in)	Events
19	0.13	Rain
20	0.6	Rain
21	0	
22	0	
23	0.61	Rain
24	0.12	Rain
25	0	
26	0	
27	0.12	Rain
28	0.06	Rain
29	0	
30	0	
31	0	
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
Jan	sum	
1	0	
2	0.03	
3	0	Rain
4	0.22	Rain
5	0.07	Rain
6	0.01	Fog
7	0	
8	0	Fog
9	0.01	Fog, Rain
10	0.18	Rain
11	0.06	Fog, Rain
12	0	Rain
13	0	
14	0	
15	0.43	Rain
16	0	
17	0.76	Rain
18	0.23	Rain
19	0.03	Rain
20	0	
21	0	Fog
22	0.03	Rain
23	0.08	Rain
24	0.02	

Date	Precip. (in)	Events
25	0.01	
26	0	Fog
27	0.02	Rain
28	0	
29	0	
30	0	Fog
31	0	Fog
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
Feb	sum	
1	0.04	Rain
2	0.3	Rain
3	0.03	Fog, Rain
4	0.3	Fog, Rain
5	0.87	Rain
6	0.75	Rain
7	0.82	Rain
8	0.15	Rain
9	0.15	Rain
10	0.02	Rain
11	0	
12	0.02	Rain
13	0	Rain
14	0.05	Rain
15	0	
16	0	
17	0	
18	0	
19	0.03	Rain
20	0.02	Rain
21	0	
22	0	
23	0	
24	0	
25	0.07	Rain
26	0.22	Rain
27	0.73	Rain
28	0	
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>

Date	Precip. (in)	Events
Mar	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	Rain
8	0	
9	0	
10	0	Fog, Rain
11	0.09	Rain
12	0	
13	0.04	Rain
14	0.54	Rain
15	2.2	Rain
16	0	
17	0.03	Rain
18	0	
19	0.01	Rain
20	0.12	Rain
21	0.13	Rain
22	0.07	Rain
23	0.2	Fog, Rain
24	0.27	Rain
25	0.15	Rain
26	0	
27	0.01	Rain
28	0	
29	0	
30	0.02	Rain
31	0.31	Rain
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
Apr	sum	
1	0.05	Rain
2	0	Rain
3	0.05	Rain
4	0	
5	0	

Date	Precip. (in)	Events
6	0	Rain
7	0.01	Rain
8	0	
9	0	
10	0.52	Rain
11	0.02	Rain
12	0	
13	0.46	Rain
14	0.05	Rain
15	0	Rain
16	0	Rain
17	0	
18	0	Rain
19	0	
20	0	Rain
21	0.16	Rain
22	0	
23	0.1	Rain
24	0.15	Rain
25	0.01	
26	0	
27	0	Rain
28	0.11	Rain
29	0.01	
30	0	
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
May	sum	
1	0	
2	0	
3	0	
4	0	
5	0.18	Rain
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	Rain
12	0.11	Rain
13	0.14	Rain



Date Precip. (in) Events

14	0	
15	0.01	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	Rain
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
Jun	sum	
1	0.09	Rain
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0.07	Rain
20	0	

Date Precip. (in) Events

21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	Rain, Thunderstorm
29	0.01	Rain
30	0	
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
Jul	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0.13	Rain
22	0	
23	0	
24	0.01	Rain
25	0.02	Rain
26	0.1	Rain

Date Precip. (in) Events

27	0.01	
28	0	
29	0	
30	0	
31	0	
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
Aug	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	Rain
11	0	
12	0.04	Rain, Thunderstorm
13	0	
14	0.57	Rain, Thunderstorm
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0.01	Rain

Date	Precip. (in)	Events
29	0.18	Rain
30	0.24	Rain
31	0.06	Rain
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
Sep	sum	
1	0.17	Rain
2	0.02	Rain
3	0	
4	0	
5	0.06	Rain
6	0.19	Rain
7	0	
8	0	
9	0	
10	0.01	
11	0	
12	0	
13	0.03	Rain
14	0	
15	0	
16	0.04	Rain
17	0.58	Rain
18	0.01	
19	0	
20	0.09	Rain
21	0	
22	0	
23	0	
24	0	
25	0.03	Rain
26	0	
27	0	
28	0	
29	0	Rain
30	0	
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
Oct	sum	
1	0.01	Fog
2	0	

Date	Precip. (in)	Events
3	0	
4	0	
5	0	
6	0.01	
7	0.38	Rain
8	0	
9	0.01	Fog, Rain
10	0.77	Rain
11	0	
12	0.34	Rain
13	0.07	Rain
14	0	
15	0	
16	0.01	
17	0.04	Rain
18	0.16	Rain
19	0	Rain
20	0	
21	0	
22	0.01	Fog
23	0	Fog
24	0.01	Rain
25	0.35	Rain
26	0.09	Rain
27	0.01	
28	0.1	Rain
29	0.02	Rain
30	0.36	Rain
31	0.99	Rain
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
Nov	sum	
1	0.5	Rain
2	0.07	Rain
3	0.07	Rain
4	0	
5	0.01	Rain
6	0.01	Rain
7	0.49	Rain
8	0.38	Rain

Date	Precip. (in)	Events
9	0.16	Rain
10	0.06	Fog, Rain
11	0.05	Rain
12	0.24	Rain
13	1.31	Rain
14	1.64	Rain
15	0.75	Rain
16	0.09	Rain
17	0.74	Rain
18	0.03	Rain
19	0.08	Rain
20	0	
21	0	
22	0	
23	0.12	Rain
24	0.21	Rain
25	0	
26	0	
27	0	
28	0	Snow
29	0	Fog
30	0.01	Fog, Rain
<b>2015</b>	<b>Precip. (in)</b>	<b>Events</b>
Dec	sum	
1	0.39	Rain
2	0.06	Rain
3	0.52	Rain
4	0.12	Rain
5	0.81	Rain
6	0.55	Rain
7	1.06	Rain
8	1.51	Rain
9	0.56	Rain, Thunderstorm
10	0.63	Rain, Thunderstorm



Date Precip. (in) Events

Date Precip. (in) Events

Date Precip. (in) Events

11	0.01	Rain
12	0.56	Rain
13	0.11	Rain
14	0	Snow
15	0.02	Fog, Rain
16	0.13	Rain
17	0.82	Rain
18	0.54	Rain
19	0.01	Rain
20	0.19	Rain
21	0.83	Rain
22	0.12	Rain
23	0.09	Rain
24	0.11	Rain
25	0.05	Rain
26	0	
27	0.32	Rain
28	0.03	Rain
29	0	
30	0	
31	0	
2016	Precip. (in)	Events
Jan	sum	
1	0	
2	0	
3	0.01	Rain, Snow
4	0.07	Rain
5	0.11	Rain
6	0	
7	0	Fog
8	0	Fog
9	0	Fog
10	0	
11	0.09	Rain
12	0.52	Rain
13	0.57	Rain
14	0	
15	0.04	Rain, Snow

16	0.41	Rain
17	0.32	Rain
18	0.05	Rain
19	0.46	Rain
20	0.2	Rain
21	0.82	Rain

